

GREENBERG TRAURIG LLP

Hal M. Hirsch (HH 0417)
David Jay (DJ 7221)
200 Park Avenue
P.O. Box 677
Florham Park, New Jersey 07932-0677
Phone: (973) 360-7900
Fax: (973) 301-8410

*Attorneys for Joseph P. LaSala and Fred S. Zeidman,
as Co-Trustees of the AremisSoft Liquidating Trust, Plaintiffs*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JOSEPH P. LASALA and
FRED S. ZEIDMAN, as CO-TRUSTEES
of the AREMISSOFT CORPORATION
LIQUIDATING TRUST,

Plaintiffs,

v.

MARFIN POPULAR BANK PUBLIC
COMPANY, LTD.,

Defendants.

Civil Action No.
09-CV-00968 (JAP)

**NOTICE OF MOTION FOR A STAY
OF FURTHER CONSIDERATION OF
DEFENDANT'S MOTION TO
DISMISS BASED ON POSSIBLE
SPOILIATION OF DOCUMENTS AND
FOR AN ORDER REQUIRING
DEFENDANT TO PRODUCE
DOCUMENTS HELD BY
DEFENDANT'S COUNSEL
PURSUANT TO THIS COURT'S
ORDER OF AUGUST 7, 2009 TO
ALLOW PLAINTIFFS TO
INVESTIGATE POSSIBLE
SPOILIATION AND TO SUPPLEMENT
THEIR OPPOSITION TO
DEFENDANT'S MOTION TO
DISMISS**

PLEASE TAKE NOTICE that on Tuesday, January 19, 2010, at 11:00 a.m., or as soon thereafter as counsel may be heard, Joseph P. LaSala and Fred S. Zeidman, as co-Trustees of the AremisSoft Corporation Liquidating Trust (the "Trust"), by and through the undersigned counsel, Greenberg Traurig, LLP, shall move before the Honorable Joel A. Pisano, United States District Court Judge, United States District Court for the District

of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Room 2020, Trenton, New Jersey, for a Stay of Further Consideration of Defendant's Motion to Dismiss the Complaint Based on Possible Spoliation of Documents and for an Order requiring Defendant to Produce Documents held by Defendant's Counsel Pursuant to this Court's Order of August 7, 2009 to allow Plaintiffs to Investigate Possible Spoliation and to Supplement their Opposition to Defendant's Motion to Dismiss the Complaint., and for such other and further relief as the Court deems to be just.

PLEASE TAKE FURTHER NOTICE that in support of its motion, the movants will rely upon the Declaration of Hal M. Hirsch and the respective exhibits attached thereto, and the accompanying Memorandum of Law in support of the motion, submitted herewith.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that Plaintiffs hereby request oral argument.

Dated: December 15, 2009

GREENBERG TRAURIG, LLP

By: /s/ Hal M. Hirsch
Hal M. Hirsch (HH 0417)
David Jay (DJ 7221)
200 Park Avenue
P.O. Box 677
Florham Park, New Jersey 07932-0677
Phone: (973) 360-7900
Fax: (973) 301-8410

*Attorneys for Joseph P. LaSala and Fred
S. Zeidman, as Co-Trustees of the
AremisSoft Liquidating Trust, Plaintiffs*